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9 *Counsel for Plaintiffs Vinod Sodha and Amee Sodha*
10 *and the Proposed Class*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 PHILIP GOLUBOWSKI, INDIVIDUALLY
15 AND ON BEHALF OF ALL OTHERS
16 SIMILARLY SITUATED,

17 Plaintiff,

18 v.

19 ROBINHOOD MARKETS, INC., ET AL.,

20 Defendants.

CASE NO. 3:21-CV-09767-EMC

**SECOND STIPULATION RE FIRST
AMENDED COMPLAINT &
MOTION TO DISMISS BRIEFING
AND [PROPOSED] ORDER**

1 Plaintiffs Vinod Sodha and Ameer Sodha (the “Sodhas” or “Lead Plaintiffs”) and Defendants
 2 Robinhood Markets, Inc. (“Robinhood”); Vladimir Tenev, Jason Warnick, Baiju Bhatt, Jan Hammer,
 3 Paula Loop, Jonathan Rubinstein, Scott Sandell, Robert Zoellick (together with Robinhood, the
 4 “Robinhood Defendants”); and Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, Barclays Capital
 5 Inc., Wells Fargo Securities, LLC, Mizuho Securities USA LLC, JMP Securities LLC, KeyBanc Capital
 6 Markets Inc., Piper Sandler & Co., Rosenblatt Securities Inc., BMO Capital Markets Corp., BTIG, LLC,
 7 Santander Investment Securities Inc., Academy Securities, Inc., Loop Capital Markets LLC, Samuel A.
 8 Ramirez & Company, Inc., and Siebert Williams Shank & Co., LLC (the “Underwriter Defendants,”
 9 together with the Robinhood Defendants, the “Defendants,” and together with Lead Plaintiffs, the
 10 “Parties”) by and through their counsel of record jointly stipulate as follows:

11 WHEREAS, on April 19, 2022, the Parties filed a stipulation setting forth a schedule for the filing
 12 of Lead Plaintiffs’ amended complaint (the “Amended Complaint”), as well as briefing on Defendants
 13 anticipated motions to dismiss (the “Scheduling Stipulation”).

14 WHEREAS, the Scheduling Stipulation provides that: (1) Lead Plaintiffs’ deadline to file the
 15 Amended Complaint will be no later than June 10, 2022; (2) any motions to dismiss the Amended
 16 Complaint filed by Defendants will be filed no later than August 8, 2022; (3) should a motion to dismiss
 17 the Amended Complaint be filed, Lead Plaintiffs will file their opposition no later than October 7, 2022;
 18 and (4) the moving party(s) will file its/their reply in further support of any motion to dismiss no later than
 19 November 7, 2022;

20 WHEREAS, the Parties have conferred and agreed to a brief modification of the deadline for Lead
 21 Plaintiffs to file the Amended Complaint, from June 10, 2022 to June 20, 2022, and for Defendants to file
 22 any motions to dismiss the Amended Complaint, from August 8, 2022 to August 18, 2022;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

- 24 1. The deadline for Lead Plaintiffs to file their Amended Complaint is hereby modified from
 25 June 10, 2022 to June 20, 2022.
- 26 2. The deadline for Defendants to move to dismiss the Amended Complaint is hereby
 27 modified from August 8, 2022 to August 18, 2022.

3. All other dates and terms previously agreed to by the Parties as listed in the Scheduling Stipulation remain. Should a motion to dismiss be filed, Lead Plaintiffs' opposition will be due no later than October 7, 2022 and the moving party(s) will file its/their reply on or before November 7, 2022.
4. Nothing in this stipulation prevents any party from seeking further extensions with the consent of the other parties or from the Court.

DATED: June 2, 2022

Respectfully submitted,

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HAL CUNNINGHAM
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/s/ John T. Jasnoch
JOHN T. JASNOCH

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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: June 2, 2022

s/ John T. Jasnoch
JOHN T. JASNOCH

[PROPOSED] ORDER

Pursuant to stipulation, the Court resets the following deadlines and schedule:

1. Lead Plaintiffs shall file their First Amended Complaint no later than June 20, 2022;
2. Defendants shall file any motions to dismiss no later than August 18, 2022;
3. All other dates and terms previously agreed to by the Parties as listed in the Scheduling Stipulation filed April 19, 2022 remain.

IT IS SO ORDERED.

Dated: June __, 2022

HONORABLE JUDGE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE